

0023127

ORRES CONTROL  
UTGOING LTR NO

000025421

Rocky Flats Plant  
Aerospace Operations  
Rockwell International Corporation  
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Rockwell  
International

Contractor to U.S. Department of Energy

MAY 11 1989

89-RF-1647

Rush O. Inlow  
Acting Area Manager  
DOE, RFAO

Attention: C. C. Jierree

SHIPMENT OF PCB CONTAMINATED WASTE

In 1986, DOE ALO performed an environmental survey of operations at the RFP. At that time, ALO auditors questioned the limits on radioactivity for offsite shipment of wastes for recycling or incineration. The concern was reiterated in a 1988 followup to the environmental survey, and the offsite shipment of waste was stopped by DOE ALO until the RFP could show that no plutonium contamination existed in the wastes and that the uranium limits could be justified. Those changes have been drafted and are under review.

At the present time two drums of PCB contaminated waste are awaiting a decision on shipment. They must be shipped by May 16, 1989 or the RFP will be in violation of the Toxic Substance Control Act (TSCA). The waste consists of a drum of capacitors and a drum of semi-solid sludges.

All of the capacitors in the drum were smeared using ten separate smears and showed no detectable activity in an alpha counter. The capacitors did not come from a uranium area. The drum containing the sludge was sampled and was found to measure levels of plutonium contamination below the draft limits developed for the revised offsite shipment procedure, which are essentially detection limits, and are quite conservative. The measured value was  $.002 \pm .003$  pCi/gram of waste. The proposed limit is .01 pCi/g.

Approval is requested from your office to ship the capacitors and the sludge to a disposal facility for incineration.

R. J. Erfurdt, Director  
Health, Safety and Environment

Original and 1 cc: R. O. Inlow

ADMIN RECCRD

SW-A-002907

89 RF 1647

DIST	LTR	ENCL
ACHINI, D. J.		
DER, C P		
FURDT, R J	X	
INTZ, E R		
ODD, R C		
CKER, E H		
IZER, J E		
BY, W A		
NETT, J F		
EYERS, G W		
HECKER, J H		
ANNON, W M		
ITH, R E		
ESTON, W F		
OZNIAK, B D		
JUNG, E R		

HETCHER, D H	
ARNIVAL, G J	
FERRERA, D W	
ARMAN, L K	
EBERT, J L	
HOEY, J B	
HOFFMAN, R B	
AMANN, R L	
RIEG, D M	
UDENBURG, G E	
ACKINLEY, K B	
AIMON, E R	
NEWBY, R L	
TURNER, H L	
ELASQUEZ, R N	

CORRES. CONTROL X X

2000's F.D.	X
2000's F.P.	X
2000's G.H.	X
2000's S.	X

CLASSIFICATION

UNCLASSIFIED X

CONFIDENTIAL

SECRET

AUTH. CLASSIFIER SIG.

BKGear

DATE 5-08-89

IN REPLY TO LTR. NO.

EC #

TR. APPROVALS

GHS

BKG

ORIG. &amp; XEROX INITIALS

X/m

RF-46469 (Rev 9/88)